

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
vs.	)	No. 15 CR 50005
	)	
NEIL SHARMA	)	Magistrate Judge Iain D. Johnston

**AGREED PROTECTIVE ORDER**

Upon the agreed motion of the parties for a protective order, it is hereby ordered as follows:

1. All materials produced by the government in preparation for or in conjunction with any stage of the proceedings in this case, including but not limited to grand jury transcripts, agency reports, witness statements, memoranda of interview, and any documents provided by the government, excluding trial exhibits, remain the property of the United States. Upon conclusion of all stages of this case, all of the materials and all copies made thereof shall be disposed of in one of three ways, unless otherwise ordered by the Court. The materials may be (1) destroyed; (2) returned to the United States; or (3) retained in defense counsel's case file. The Court may require a certification as to the disposition of any such materials. In the event that the materials are retained by defense counsel, the restrictions of this Order continue in effect for as long as the materials are so maintained, and the materials may not be disseminated or used in connection with any other matter without further order of the Court.

2. All materials provided by the United States may be utilized by defendant and his counsel solely in connection with the defense of this case and for no other purpose and

in connection with no other proceeding. The materials and their contents shall not be disclosed either directly or indirectly to any person or entity other than defendant, defendant's counsel, persons employed to assist in the defense, or such other persons as to whom the Court may authorize disclosure. Any notes or records of any kind that defense counsel or any other recipient may make relating to the contents of materials provided by the government shall not be disclosed to anyone other than the defendant, defense counsel, and persons employed to assist in the defense, or such other person as to whom the Court may authorize disclosure, and all such notes and records shall not be disclosed except as provided by this Order.

3. The materials shall not be copied or reproduced by defense counsel or any other recipient, except as necessary to provide copies of the materials for use by defense counsel, defendant and such persons as are employed by them to assist in the defense. Such copies and reproductions shall be treated in the same manner as the original matter.

4. Prior to providing or disclosing any of the materials to any recipient, defense counsel shall provide a copy of this Order to each recipient and shall advise each recipient that at the conclusion of this case, the materials must be returned to defense counsel. All individuals and entities receiving these materials from defense counsel shall be subject to this Order and shall not further disclose the materials or their contents except as permitted by this Order or any further order of this Court. Defense counsel shall maintain a copy of this Order that has been signed and dated by each recipient who received any materials subject to this Order.

5. Violation of this Order may result in the imposition of civil and criminal sanctions.

ENTER:



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IAIN D. JOHNSTON  
UNITED STATES MAGISTRATE JUDGE

DATE: March 31, 2015

Agreed and Jointly submitted by:

/s/ Keith Spielfogel  
KEITH SPIELFOGEL  
Attorney for Neil Sharma

3/30/2015  
DATE

/s/ Scott R. Paccagnini  
SCOTT R. PACCAGNINI  
Assistant United States Attorney

3/30/2015  
DATE